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Attorneys for Defendants
COMCAST CORPORATION; NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; NATIONAL URBAN LEAGUE, INC.; AL SHARPTON; NATIONAL ACTION NETWORK, INC.; and MEREDITH ATWELL BAKER.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

NATIONAL ASSOCIATION OF
AFRICAN-AMERICAN OWNED
MEDIA, a California limited liability
company; and ENTERTAINMENT
STUDIOS NETWORKS, INC., a
California corporation,

Plaintiffs,

V.

COMCAST CORPORATION, a Pennsylvania corporation; TIME WARNER CABLE INC., a Delaware corporation; NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, a New York corporation; NATIONAL URBAN LEAGUE, INC., a New York corporation; AL SHARPTON, an individual; NATIONAL ACTION NETWORK, INC., a New York corporation; MEREDITH ATWELL BAKER, an individual; and DOES 1 through 10, inclusive.

Defendants.

CASE NO. 2:15-cv-01239-TJH-MAN

**JOINT STIPULATION REGARDING
MOTION TO DISMISS BRIEFING
SCHEDULE AND PAGE LIMIT
EXTENSIONS**

ACTION FILED: Feb. 20, 2015

JUDGE: Hon. Terry J. Hatter, Jr.

1 By and through their undersigned counsel of record, Plaintiffs National
2 Association of African-American Owned Media and Entertainment Studios Networks,
3 Inc., and Defendants Comcast Corporation, Time Warner Cable Inc., National
4 Association for the Advancement of Colored People, National Urban League, Inc., Al
5 Sharpton, National Action Network, Inc., and Meredith Atwell Baker hereby stipulate
6 and agree as follows:

7 WHEREAS, Defendants intend to move to dismiss the Complaint that Plaintiffs
8 filed on February 20, 2015;

9 WHEREAS, the parties desire to set a briefing schedule for Defendants' planned
10 motions to dismiss to allow for adequate time for the parties to fully brief the motions;

11 WHEREAS, in the interests of judicial economy and efficiency, the parties
12 agree that Defendants Comcast Corporation, National Association for the
13 Advancement of Colored People, National Urban League, Inc., Al Sharpton, National
14 Action Network, Inc., and Meredith Atwell Baker may file a single consolidated
15 motion to dismiss rather than multiple separate motions to dismiss, so long as (1) the
16 page limit for the memorandum in support of the consolidate motion to dismiss is
17 extended to 50 pages, (2) the page limit for the memorandum in support of Plaintiffs'
18 response to the consolidated motion is extended to 50 pages, and (3) the page limit for
19 the memorandum in support of a consolidated reply is extended to 35 pages; and

20 WHEREAS, Defendants do not intend to waive any personal jurisdiction
21 defenses by agreeing to this joint stipulation and Plaintiffs agree that they will not
22 argue that Defendants have waived any personal jurisdiction defenses by agreeing to
23 this joint stipulation.

24 THEREFORE, IT IS STIPULATED AND AGREED THAT

25 1. Defendants shall have until April 24, 2015 to move to dismiss Plaintiffs'
26 Complaint;

27 2. Plaintiffs shall have until May 8, 2015 to file a response to Defendants'
28 motions to dismiss;

1 3. Defendants shall have until May 22, 2015 to file a reply in support of their
2 motions to dismiss;

3 4. The hearing on Defendants' motions to dismiss will be calendared for June 8,
4 2015;

5 5. Defendants Comcast Corporation, National Association for the Advancement
6 of Colored People, National Urban League, Inc., Al Sharpton, National Action
7 Network, Inc., and Meredith Atwell Baker may file a single consolidated motion to
8 dismiss with a memorandum in support of up to 50 pages in length and a single
9 consolidated reply with a memorandum in support of up to 35 pages in length, and
10 Plaintiffs may file a response to the consolidated motion with a memorandum in
11 support of up to 50 pages in length; and

12 6. Defendant Time Warner Cable Inc. may file a motion to dismiss with a
13 memorandum in support of up to 25 pages in length, Plaintiffs may file a response to
14 Time Warner Cable Inc.'s motion with a memorandum in support of up to 25 pages in
15 length, and Time Warner Cable Inc. may file a reply with a memorandum in support of
16 up to 25 pages in length.

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1 Dated: March 31, 2015

2 GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Bradley J. Hamburger
4 Bradley J. Hamburger

5 Attorneys for Defendants
6 COMCAST CORPORATION; NATIONAL
7 ASSOCIATION FOR THE ADVANCEMENT
8 OF COLORED PEOPLE; NATIONAL
9 URBAN LEAGUE, INC.; AL SHARPTON;
10 NATIONAL ACTION NETWORK, INC.; and
11 MEREDITH ATWELL BAKER.

12 Dated: March 31, 2015

13 WHITE & CASE LLP

14 By: /s/ Bryan A. Merryman
15 Bryan A. Merryman

16 Attorneys for Defendant
17 TIME WARNER CABLE INC.

18 Dated: March 31, 2015

19 MILLER BARONDESS, LLP

20 By: /s/ Louis R. Miller
21 Louis R. Miller

22 Attorneys for Plaintiffs
23 NATIONAL ASSOCIATION OF AFRICAN-
24 AMERICAN OWNED MEDIA; and
25 ENTERTAINMENT STUDIOS NETWORKS,
26 INC.

27 I hereby attest that pursuant to Local Rule 5-4.3.4, I have received concurrence
28 in the filing of this document from each of the other Signatories.

29 /s/ Bradley J. Hamburger
30 Bradley J. Hamburger